Quid Novi

VOL. VI NO. 16 | McGILL UNIVERSITY FACULTY OF LAW
FACULTE DE DROIT UNIVERSITE McGILL | February 5, 1986
5 février, 1986

MOOTING REFORM

by Andrew Foti

Most popular dramatizations of legal cases portray lawyers as polished public speakers whose cunning arguments and forceful persuasion almost invariably get the client "out of a bind". While good oral advocacy is one of the key attributes of a competent lawyer, it is much more rare in practice than in the movies.

Unfortunately, many law students dread the very experience which is designed to develop their abilities as advocates. Mooting is generally perceived as an ordeal to be survived; learning from the experience is considered only a secondary purpose.

The McGill Moot Court Board has long felt that something needed to be done to improve this situation. With this in mind, we have restructured the mooting program this year, responding to a number of criticisms which have been voiced in the past. The following program has been tentatively put in place for the 1985-86 year.

There will be two (2) mooting periods, with half of the first-year class mooting in each period. Students may choose the period of their preference. Since enrollment in each period is limited, these selections will be on a "first-come, first-served" basis. Students may also select their own partners, but are strongly advised to select a partner from the same degree stream, i.e. B.C.L. or LL.B. Those not indicating any preference will be assigned to a period and/or partner by the M.C.B.

Each period will be structured in the following way:

Day 1: Moot problems distributed to appellants by the M.C.B.

Day 6: Appellants submit their "Grounds for Appeal" to S.A.O.

Day 7: Respondents receive their moot problems and appellants' Grounds for Ap-

Cont'd on p.5

CHALLENGER. STAR WARS AND BEYOND

by Andy Orkin

No one can fail to be moved by the television images, replayed a thousand torturous times, of seven astronauts coming to a fiery end against a blue Florida ski.

But as the media began its meal on a nation's very real grief, many were asking why the event was, in the greater context of things, so shocking.

On the day of the launch, many thousands more of the children of the world died of starvation.

This is not to be callous; no one death can be said to be more or less senseless and sad than another. But the questions about the space programme are not new, are not a product of last Tuesday's tragedy. They are fundamental to the matter of spending billions on a quest for the stars rather than a quest for the starving.

Critics of both of the superpowers' space programmes hold that they are science in the service of a military build-up that threatens world survival. This view is not without reason. Werner von Braun's Nazi rocket programme had the population of London in its sights. Von Braun changed employers and went to work in the States; his genius is now in silos and submarines, poised and ready to deliver death to the world. His genius propelled Challenger flight 25 for 75 seconds before it blew up.

What's the Challenger programme about? Exploration of space, scientific experiments, and the launching of satellites, it seems. But deeper analysis reveals that the Challenger programme would never have been undertaken without Pentagon participation. The Challenger was extensively modified to unre-

Cont'd on p. 3

ANNOUNCEMENTS

International Law Society

La société Québecoise de Droit Internationale will be holding its annual Conference May 15-16, 1986 at McGill. We require 3 students to act as rapporteurs for one half-day each. If you are interested in helping or obtaining more information, please leave a note for I.L.S. in the "I" box in S.A.O.

The United Nations Association in Canada will sponsor the second Canadian National Model United Nations, July 7-12, 1986 in Montreal. Law students will participate in a simulation of the International Court of Justice. Details on ILS board in Pit, or leave note in S.A.O.

The Canadian Branch of the International Law Association invites all students and professors to the second Louis M. Bloomfield Memorial Lecture in International Law. The speaker will be: The Honorable Sir Gordon Slynn, first Advocate General at the Court of Justice of the European Communities. He will be speaking on "The European Court of Justice: Supranational and International" on Wednesday, February 12, 5:30 p.m. in room 101 of the Faculty of Law, McGill University. For information, call 392-4632.

ATTENTION

Skit Night URGENTLY needs musicians, keyboardists, guitarists, bassist, drummer, etc., to form the Skit Night orchestra. All serious and semi-serious musicians are asked to attend a meeting Friday, February 7, 1986 at 1 p.m. in Room 200. For more info. contact Vincent Gallo (or leave a message in SAO). Join Skit Night production and get the spirit.

TO THE ATTENTION OF ALL STUDENTS

SECOND TERM TRANSCRIPT VERIFICATION

ALL STUDENTS MUST VERIFY THEIR TRANSCRIPT AT

THE STUDENT AFFAIRS OFFICE

BETWEEN
9:30 a.m. and 4:30 p.m.

COMMENCING THURSDAY, FEBRUARY 11

Graduating students are especially urged to verify their transcripts immediately.

Your compliance in verifying your record as early as possible will ensure immediate processing of corrections.

Talmud Class

Thursday, 1:00 p.m.
Room 204

This week's topic: Talmudic law on lotteries and gambling.

THE LEGAL AND POLITICAL PROBLEMS OF NATIVES

by Martha Montour

Chief Myrtle Bush of the Kahnawake Reserve was invited by Women and the Law to McGill Law School on Wednesday, January 22. Chief Bush, a former student of the faculty, discussed the role of women and lawyers with respect to solving various legal and political problems of native people.

She spoke of the equal role of women in traditional native politics and how this was radically altered by the imposition of patriarchal values via the Indian Act. Now that the discriminatory sections of the Act have been abolished, women are taking a more active and productive role in the political system.

She also presented the role of lawyers in native political systems. Lawyers must learn that natives do not want non-native law applied. They want laws to reflect their values and goal of self-determination. Bush said, "Lawyers find loopholes in tax and corporate law, why not for natives? Lawyers come to natives with no background in native law. We have to indoctrinate them to our way of thinking and values. I know the lawyers are excited about the future increase in native litigation."

Bush also has expectations of a liberal and generous interpretation of aboriginal rights which are protected by the Charter. She hopes that the court and lawyers will recognize other native rights beyond those enacted in the Indian Act. The Supreme Court has recognized such rights in cases such as Norwjevick (tax) and Musqueam (fudici-

NAZI GERMANY AND THE GERMAN BAR

Nazi Germany created a terrorist legal order. This was the message of Professor Udo Reifner of the University of Hamburg in a lecture entitled, "Militarism and Anti-Semitism in the Legal System -- the Fall of the Liberal Bar in Nazi Germany".

Professor Reifner began by outlining the triangle of power that exists in the German legal system. Law school graduates become judges, civil servants who prosecute on behalf of the state, or members of the Bar who defend the rights of individuals. With the Nazi regime firmly installed, the once proud and liberal German Bar became an instrument of oppression. The Bar had been liberal because it contained a large number of Jewish lawyers who themselves had to be liberal, for only in such a climate were they tolerated. Ironically, the Bar became oppressive, also because it contained a large number of Jewish lawyers.

The Nazis had no place in their vision of Germany for liberal thinkers. Everything perceived as liberal was considered Jewish, something to malign and eliminate. Nazi lawyers were heralded as "guards of the law". "Jewish solicitors" were accused of being citizens against the state, lacking in morals, taking money to defend criminals. Defending criminals contravened community standards dictated by what was by then a distorted legal triangle. Where once judges were neutral decision-takers to opposing arguments of defence and state, they became the enforcers of the inflexible laws of a government. Consequently, both members of the Bar and prosecutors merely went through the motions prescribed by the judge. For example, a defence lawyer would ask the court for a death sentence, claiming that there was no argument capable of casting his client's guilt into doubt. Statistics alone attest to some 30,000 death sentencings during the Nazi regime.

At one time, the Jewish lawyers had been very much integrated with the rest of the Bar, but by 1933 things changed when there was a growth in membership that diluted the earning power of all members. The president of the Bar requested from the Nazis a law to limit membership with the result that Jews were, in the temper of the times, convenient targets. They were expelled, all of them, by 1938. This development explains why defence lawyers cooperated with the fraudulent system: with the Jewish lawyers went the "liberal backbone" of the German Bar.

Though the SS, and not the legal machinery, represented Nazi Germany's greatest killer, Reifner found the decline of the liberal legal system particularly incidious. A nation's criminal procedure, said the professor, is a guage of its power, of whether it is civilized or uncivilized. In Nazi Germany, judges and lawyers disguised terrorism in legal clothing using legal arguments and logical reasoning to provide legitimacy to an arbitrary system. Their perverse judgements disrupted public morals and returned Germany to a pre-democratic era when the law was there to enforce the will of the king, when there were no solicitors to defend individual human rights. Nazi Germany had solicitors, but, deprived of the liberal Jewish element, these lawyers became mere servants to a facist regime.

Challenger

Cont'd from p. 1

vealed military specification during development. Two flights so far have been top secret military missions on undisclosed dates with unmentionable cargoes.

There are bigger things in store for the shuttle. The name of the game here is payload economy. The shuttle makes putting hardware in space almost affordable. It has a Canadarm aboard, which will be deft at emplacing quantities of laser mirrors and destroyer satellites in orbit. The militarization of outerspace raises serious questions in international law.

There is more food for thought in last week's explosion. The space programme is the pinnacle of man's technological achievement. We were confident -- brash? arrogant? -- to the point of putting a young schoolteacher and mother (and with her the hearts of her family and millions of Americans) on board Challenger.

The Shuttle is child's play by comparison to that other apple of President Reagan's technodazzled eyes. The Star Wars plan calls for millions more devices than one mere space-craft, to be deployed in a vast, complex, interdependent network. The shuttle was tested, its boosters were tested, and only then were Christa MacAuliffe and Marc Garneau recruited as PR orbiters for NASA. Star Wars cannot, can never be tested before it is called upon to do its fantastic duty in defence of America.

Cont'd on p. 8

LETTERS TO THE EDITOR

Dear Editor,

Since entering McGill in September '85, I've noticed that there seems to be a fashionable "open-season" on law school and faculty "bashing". During the first semester, I believed some of the "constructive" criticism of the law school printed in the Quid seemed libellous rather than constructive and should have been aired in a local Legion hall where exaggerated "war stories" are more appropriate. I refer with regret to the Dermer articles amongst others. At the time, however, I feared not being well enough informed to support or defend various views forwarded by my peers and resolved to complete my first semester before venturing any personal opinions. Now that the semester is past, surprisingly enough my best memories reflect some of the positive aspects of our law school, that perhaps from time to time are forgotten.

My first memory of McGill is that of being warmly welcomed by upper-year students who organized orientation week. Those early social events that brought together students from all years proved to be an enjoyable and effective way of "breaking the ice". Many of the friendships I've made at McGill resulted from initial introductions during orientation events.

There were other services the upper-year students provided that helped me through the first semester, services not necessarily offered in other law schools. Law Partners, the tutorial groups and the volunteer bookstore do make life easier. I do not relish running to the main campus on any occasion to purchase a semester's worth of reading material regardless of our bookstore's temperamental hours. I also found that there were senior students who were willing to dig up more course summaries than my meagre student budget would allow me to photocopy, not bad for a school that is rumored to be so viciously competitive. My only regret regarding first semester was not being able to participate in more club activities, conferences, social events and not being able to attend more speeches by guest lecturers. If there is an apathetic student body in our school there seems to be no lack of organizational initiative.

There were times during the first semester that I was inconvienced by waiting around for a 3:30 class. However, compared to my friends studying at U.N.B., Manitoba, Toronto, and Windsor, I profit from the National Program, the opportunity to study in two languages, the beautiful city of Montreal, Mount Royal around the corner, and eventually, the right to inscribe "McGill" on a c.v. When I'm quick to criticize, I forget McGill was my only choice of a law school and for very good reasons.

I'm not implying that our law school is perfect, nor that we should refrain from initiating change. We must take full advantage of student participation on the Board of Student Advisors, the Admissions Committee, the Faculty Council, the Law Students Association and all other student "outlets" to vent our views for change. We must realize, on the other hand, that while there are five hundred student views of what is "change for the better", there is only one bureaucracy to grapple with the problems of implementing the "better". What is better for me may not be better for the class entering in 1900. While we accuse the administration of being slow to change we forget that the bureaucracy must live with the implications of change longer than our three or four years of study.

Despite the cynicism of some students, I have seen many changes in my first semester ranging from the methods of allocating LSA budget funds to improvements in the Mooting program. The recent Faculty announcements that the course curriculum in both the common and civil law programs will be streamlined is also evidence that change is possible at McGill.

Many of us came to McGill because over its 135 years its students and teaching staff have established a reputation -- together. The law school is, despite the triteness of the saying, a reflection of all those who compose it. I like McGill, I'm happy to be here and I know I made the right choice. By taking advantage of every opportunity and student mechanism through which to voice our opinions and implement constructive ideas, a letter of acceptance from McGill in the year 2010 will mean what it meant for us. There are challenging problems to face but a problem without any challenge is an accomplishment without satisfaction.

If there are problems with our law school tomorrow it is because we

Cont'd on p. 6

COURSE SHUFFLE

by Joseph Kary

Course change is over. Once again, like every other year, courses that everyone was clamouring to get into, and that were filled in the first week, are now half-empty. Choosing courses involves hassles at every university, but here at law school administrative policy compounds those hassles immeasurably.

One of the biggest problems is the "add-one, drop-two" rule. Because of it, students inevitably sign up for an extra course at pre-registration, just to preserve as much free choice as possible. Courses are over-subscribed, and people who want to take them can't get in. And, because the deadline for dropping courses is later than the deadline for adding them, students can't get into the course even though someone else dropped it. Results? The bookstore orders copies of casebooks that no one needs, and the purpose of the restrictions, to allow the administration to know how many people will take which courses before term begins, is defeated. Meanwhile, "closed" courses are half-empty, and people who might want, or have even registered for, the course are unable to take it.

Another problem is caused by the way different sections of the same course are scheduled in the same time-slots. Students who might otherwise have avoided scheduling conflicts by taking a differently-timed section either have to miss one of two over-lapping classes, or else avoid taking a course they want. Yet is there any reason why both sections of Insurance should be on Monday and Tuesday mornings at 8:30 - 10:00, or why both sections of Commercial Transactions and Judicial Review were held at virtually the same times last term? The result is that choosing between different sections of the same course becomes nothing more than a popularity contest, while a student's freedom to choose courses, or work part-time, or schedule other activities, is frustrated.

There doesn't seem to be any reason for these policies; they're just there, and seem to cause problems for students and for the Faculty as a whole. The remedies are obvious -- either have an add-two-drop-two rule, or else abandon restrictions on course changes and take greater care in scheduling multi-sectioned courses.

Mooting
Cont'd from p. 1

peal from M.C.B. (Prior to this date respondents will not know to which problem they have been assigned).

Day 10: Appellants submit factums to S.A.O.

Day 16: Respondents submit factums to S.A.O.

Oral pleadings will begin a few days after respondents have handed in their factums. Students may plead in French provided that they indicated their preference when signing up for Mooting I. However, it is recommended that both members of a team plead in the same language. A detailed schedule for Mooting I in 1985-86 is set out below:

Monday, February 3, 1 p.m.: Mooting Seminars

Tuesday, February 4, 1 p.m.: Mooting Seminars

First Group (February 5) & Second Group (March 5), 5:00 p.m. :
Appellants receive problems from M.C.B.

First Group (February 10) & Second Group (March 10), 10:00 a.m.
Appellants submit Grounds of Appeal to S.A.O.

First Group (February 11) & Second Group (March 11), 5:00 p.m.
Respondents receive problems and Grounds of Appeal from M.C.B.

First Group (February 14) & Second Group (March 14), 5:00 p.m.
Appellants' factums due at S.A.O.

First Group (February 20) & Second Group (March 20), 5:00 p.m.:
Respondents' factums due at S.A.O.

First Group (February 21) & Second Group (March 21), 10:00 a.m.:
Respondents receive Appellants' factums from M.C.B.; judges receive materials from M.C.B.

First Group (March 4) & Second Group (March 25): Oral Pleading

First Group (March 6) & Second Group (March 27): Oral Pleading

The new structure has a number of advantages over the previous organization of Mooting I. A two-period format in which the appellants and respondents work consecutively rather than concurrently should minimize the class disruption and strain on library re-

Cont'd on p. 6

Mooting
Cont'd from p.5

sources which has typically occurred in the past. The extension of factum preparation periods to ten (10) days for appellants and nine (9) days for respondents will further alleviate such problems, and should also result in better quality factums. In addition, oral pleadings should improve since respondents will now receive the basic structure of the appeal before commencing their research. This will ensure that the parties "join issue", i.e. argue the same questions. Finally, the new format will allow students more freedom in planning the semester since they will have a choice between two mooting periods.

Several other changes instituted by the M.C.B. should also improve the quality of the first-year mooting experience. Most notable in this regard is the introduction of an instructional component to Mooting I. There are two aspects to this instruction:

(1) The Students' Manual for Mooting I is the first of its kind to be offered to mooters at McGill. It introduces the structure of our program, and provides a brief introduction to proper factum-writing and techniques of oral advocacy. It also includes the revised McGill Moot Court Board Official Rules and the applicable grading scheme. A number of copies have been placed on reserve in the library. The manual may also be purchased from the M.C.B.

(2) A set of instructional seminars offered jointly by the M.C.B. and the Board of Student Advisors (B.S.A.) will survey various aspects of appellate court advocacy. Under the guidance of their first-semester tutorial leaders, students will be introduced to mooting, and will be able to explore questions arising from their review of the Manual.

In addition, the M.C.B. has attempted to standardize the format of moot problems, and will not be including a list of leading cases with each problem. This will alleviate some of the research burden, thus enabling students to concentrate on factum writing and oral pleading in Mooting I. A positive side-effect to this minor change may be that less stress is placed on library resources.

The Moot Court Board believes that mooting is designed to simulate real situations so as to develop students' abilities to deal with them in an effective and timely manner. Mooting I is an introduction to appellate court advocacy, and is intended to familiarize students with the basics of conducting an appeal. This will provide a foundation for a more rigorous compulsory second-year moot, and for the optional competitive moots in which McGill participates.

The Moot Court Board welcomes comments on any aspect of the program. We hope to revise the manual before the 1986-87 academic year, and would be particularly grateful to receive written suggestions for its improvement.

Letters
Cont'd from p. 4

thought nothing about it today. Nothing positive was ever accomplished by a cynic. Let's appreciate what we have on our side at McGill and realize the importance of perseverance and optimism. More importantly, before we attack, let us at least respectfully acknowledge the contributions and the stature of those who have built McGill over the years in good faith.

Stephen Schenke
BCL I

Letter to the Editor,

As law students, we more than anyone else should know that even the obviously guilty are entitled to a hearing. For this reason, it was disappointing, and a little bit frightening, to read Asher Neudorfer's and John Richards's article in the Quid last week. They believed that the South African ambassador should not have been allowed to publicly debate Irwin Cotler over the case for applying international legal sanctions against South Africa, a debate that had been scheduled to take place at the University of Toronto but had been cancelled due to loud protests.

Neudorfer and Richards believe that free speech is not an absolute right, and that apartheid, as an international crime against humanity, is so abhorrent that the ambassador should not be allowed to argue that international sanctions should not be imposed. Yet they seem, at least at one point, to be a bit embarassed by their argument. After writing that freedom of speech can legitimately be restricted to achieve other ends, they go on to say that such restrictions are not a "denial" of free speech, but "rather its redefinition in the light of the society that we are trying to build in Canada." This is as bad an example of doublethink as you could hope to find. Why not simply recognize that freedom of speech is being restricted in order to protect other, equally important, values?

Cont'd on p. 7

PLACEMENT CENTRE

Alberta

The firm of CODE HUNTER in Calgary will be hiring eight students for articling positions commencing the Summer of 1987. To this end representatives of this firm will be at the Faculty of Law, Monday, Feburary 10th, to conduct interviews for these positions. Interested students should see Mrs. Higgins to arrange for a suitable interview time (sign up please before February 7th). They should submit a copy of their C.V.'s and provide academic transcripts. Refer to Posting #57.

Ontario

The firm of BURKE-ROBERTSON, CHADWICK & RITCHIE, Ottawa, will be hiring four articling students for the Ontario articling period 1987/88. This firm will consider all applications received up to and including May 2, 1986, but will be unable to consider any applications received after that date. Interviews will take place May 27, 28 and 29th 1986. Applicants should include a C.V. and transcripts or marks available. Please forward pertinent information to:
Mr. Walter T. Langley
Burke-Robertson, Chadwick & Ritchie
130 Albert Street, 18th Floor
Ottawa, Ontario
K1P 5G4
Refer to Posting #58.

WEIR & FOULDS (Ottawa) have an opening for an articling student to work for the 1986/87 articling year. Interested applicants should forward their resumé to:
Mr. John Buhlman
Weir & Foulds
Suite 1515
50 O'Connor Street
Metropolitan Centre
Ottawa, Ontario K1P 6L2
Refer to Posting #60.

FLETT BECCARIO CROUCH QUINN & D'AMICO (Welland) are interested in hiring one and possibly two students for the 1986/87 articling year and also for the 1987/88 articling year. Interested students should consult Posting #61 for further information.

McDONALD & HAYDEN will be interviewing prospective articling students for the term commencing in the summer of 1987 through to the summer of 1988. For further details regarding this firm please consult their brochure now available in the Placement Centre.

Note: The deadline for students applying for summer jobs with Ontario law firms is February 18, 1986, according to the Guidelines of the Upper Canada Law Society.

Quebec:

Mr. Norman Steinberg of the Montreal office of OGILVY, RENAULT will be conducting a seminar on this firm's programme for summer and articling students. Those interested in signing up for this seminar are requested to submit their names to Mrs. Higgins in the Admissions Office.

Letters
Cont'd from p. 6

Maybe it's because these kind of restrictions are more characteristic of the societies we wish to condemn than they are of our own. South Africa has a monolithic censorship system, and its reach extends beyond her borders; no South African is allowed to publicly advocate divestment abroad if he ever hopes to return.

Richards and Neudorfer argue that we should not shun the Soviet Union the way we should shun South Africa. "We all condemn flagrant human rights abuses in that country. But no one seriously claims that Soviet socialism is a crime against humanity, or questions the legitimacy of the regime." Yet, although Soviet socialism is not a crime, the Soviet government has engaged in crimes against humanity. It engages in torture. It also engages in political repression, and it has persecuted religious minorities, from Jews and Christians to Eskimo shamans. And, not so coincidentally, it imposes censorship, something which seems to both nourish and be fed by repression and authoritarianism.

The propaganda South Africa issues for foreign consumption is different from the truth of the situation at home. It portrays a society slowly and surely moving towards racial equality and harmony, to be achieved perhaps sometime in the 21st century, an island of relative peace and justice amidst a continent of oppression and petty dictators. This image is not just being put forward on radio stations and university campuses; it is put in full-colour booklets written by PhD's and mailed to private investors, and it is passed along in private conversations. If it is to be countered, the story has to be brought into the open and refuted.

* * * *

Sometimes, watching children on the playground, one can see a group of kids tease on particular child unmercifully, or make a big game out of refusing to

Cont'd on p. 8

SKIT NITE : THE TRADITION CONTINUES

Exam marks have been posted for quite some time and many of you may be re-assessing your career choices, perhaps looking for other areas in which your talents can be exercised. Others amongst you may have done so well that you're looking for something with which you can fill up all your spare time.

Either way, we have something for you! Traditionally, Skit Nite is the Faculty's main event of the second semester. Actually, it is the thing we're best known for in other parts of the University and it enables us to show the world how creative we can be. In order to preserve that level of excellence we are presently seeking students for the various tasks required to carry this event through to fruition. Obviously, ingenious skits are necessary and the writers amongst us are encouraged to contact Teresa Scasa or Chris Allard. They will help fit your creation into the underlying theme, to be unveiled the evening of Friday March 14, 1986. However, the production entails many other necessary functions as well. We need actors, singers, comedians and musicians to perform as well as persons knowledgeable about lighting, sound and stage productions. Also, for those who feel they would like to help out but aren't quite sure what they'd like to do, we need people to sell tickets, serve beer, set up the stage, prepare the performers as well as numerous other peripheral activities. So for all you aspiring performers, and dedicated personnel, now is the time to step forward and present yourselves to either Vince Gallo or Lenny Roth. As for the rest of you, see you at Skit Nite!

Letters
Cont'd from p. 7

speak to him. I am not suggesting that South Africa should be compared to a picked-upon child; but if we stop the ambassador from speaking, or throw wooden maces at him, as happened in November at the U. of T., then that is exactly what he will look like. The case for political and economic sanctions against South Africa can be amply demonstrated; but if, while imposing those sanctions, we refuse to allow South African representatives to speak, we are moving out of the realm of international law and into the schoolyard.

Joe Kary

Challenger
Cont'd from p. 3

And yet the Challenger went wrong. The Challenger lesson is that we are not, and our technology certainly can never be, infallible. Technologically speaking, there may be better things to spend billions on than the ShuttleStar Wars siblings. Morally speaking, there certainly are.

Ronald Reagan said after the explosion: "The future belongs to the brave." There's a familiar ring to that line. "The meek shall inherit the earth" maybe? Reagan mourned the Challenger 7 as he spoke, as did we all. But what of the daily deaths of the meek?